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June 15, 2020

VIA ECF

Honorable Esther Salas, U.S.D.J. United States District Court District of New Jersey Martin Luther King Building & U.S. Courthouse 50 Walnut Street Newark, NJ 07101

Re: In Re. Petition of the Republic of Turkey for an Order Directing Discovery from Hamit Cicek Civil Action No. 2:19-cv-20107-ES-SCM Our File No. 23452

Dear Judge Salas

As Your Honor is aware, this firm represents Hamit Cicek in the above-referenced matter. Accompanying this letter is our submission in opposition to the Republic of Turkey's Second Petition for an Order Directing Discovery from Hamit Cicek Pursuant to 28 U.S.C. § 1782.

With apologizes, we are re-submitting materials previously filed in this matter, most specifically the voluminous exhibits attached to my Declaration, and the Declaration of Mehmet Tahsin with exhibits. We are re-submitting same out of an abundance of caution so as to ensure that the record in opposition is complete, given that the Court's prior Orders have been stricken.

We recognize that Your Honor's Individual Rules do not require us to provide a copy of our filing. However, given the volume of material, if Your Honor wishes to have us provide a courtesy copy to the Court, we will gladly do so.

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I thank Your Honor for consideration of the above, and apologize for any inconvenience this may cause.

Respectfully yours,

WEINER LAW GROUP LLP

By: <u>s/Ronald A. Berutti</u>

Ronald A. Berutti

A Member of the Firm

RAB:cfg

cc: James E. Berger, Esq. (via ECF)

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